

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

ANCHORAGE SCHOOL DISTRICT, *et al.*

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION, *et al.*,

Defendants.

Case No. _____

DECLARATION OF MARIBETH K. CALABRO

I, Maribeth K. Calabro, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am the President of the Rhode Island Federation of Teachers and Health Professionals (RIFTHP). I have been in this position since November 2024. I make this declaration based on my personal knowledge, RIFTHP's business records, and public records in RIFTHP's possession.
2. I have been a public-school teacher in Rhode Island for 30 years and previously served as President of the Providence Teachers Union, AFT Local 958. I have extensive experience advocating for educators and school personnel, negotiating contracts, supporting professional development initiatives, and advancing public education policy. I have a bachelor's degree in Elementary Education/Special Education and a master's degree in special education. I am a certified Building Administrator and in the Science of Teaching Reading and Dyslexia. I have served on many committees both within the Providence School District and in the community. Most recently, I have served on the Blue-Ribbon Commission for a Fair and Equitable Funding Formula, the Latino Issues and Policy Task Force, and the AAPI Task Force

for AFT. I serve on the AFL-CIO Executive Committee, the Institute for Labor Studies and Research Board, the Healthcare Workforce Education Center Board, and serve as a lobbyist for the RIFTHP along with two Field Representatives.

3. In my role as President of RIFTHP, I represent 12,000 union members across Rhode Island, in the urban core and the urban ring, advocate for their professional and legal interests, oversee organizational operations and finances, and coordinate with local affiliates, school districts, and public agencies to support the education workforce. Our membership also includes the RI Department of Education Employees, HealthCare workers, Higher Ed students and professors, Court Reporters, Behavioral/Social Emotional support staff, and Student Assistance Counselors.

I. Background on RIFTHP

4. RIFTHP is a statewide labor organization representing educators, school nurses, education support professionals, higher education faculty, and healthcare workers. Our mission is to enhance the professional, economic, and social well-being of our members and to ensure the delivery of high-quality public services and education to all. Our objectives are to establish relationships of mutual assistance and cooperation among Rhode Island locals chartered by the American Federation of Teachers, with the American Federation of Teachers, and with organized labor; to actively support the organizing of new AFT locals; to raise the standards of teaching, health care, and public employee professionals by securing conditions essential to provide the best professional services; and to better equip students to take their places in the global, social, and political life within their communities.

5. As of July 2025, RIFTHP represents approximately 12,000 professional employees in Rhode Island, including 9,484 dues-paying members working in public K–12 schools, higher education, and public hospitals.

6. RIFTHP provides bargaining, legal representation, professional development coordination, and advocacy at the state and federal levels. We assist local affiliates with contract negotiations, policy compliance, and workforce support, particularly in high-need schools and school districts, and we have started a campaign to organize charter schools; with one charter earning recognition and currently bargaining their first contract.

II. Reliance on Elementary and Secondary Education Act Funds

7. RIFTHP members working in public schools across Rhode Island rely on Elementary and Secondary Education Act (ESEA) funds to support their instructional responsibilities, maintain manageable class sizes, provide language services for multilingual learners, and access professional development to improve teaching practices.

8. The withholding of ESEA funds has created widespread uncertainty about staffing levels, student support services, and professional development availability for the upcoming school year. RIFTHP is receiving increased inquiries from members and local unions regarding the future of grant-funded positions and programs.

9. **Title II-A** funds are critical to maintaining professional development programs and incentives that help districts recruit and retain qualified educators. These funds also support efforts to reduce class sizes in schools that serve economically disadvantaged students, where many of our members work. Putting the Providence School District title to the funds that are utilized to support effective instruction, this program provides grants and subgrants to local education agencies to increase student achievement, consistent with state standards, and provide professional learning to educators to improve instructional delivery for all students. District-level professional development is important in growing and improving student outcomes vis-a-vis teacher effectiveness for low-income and minority students, particularly in Providence. In any post-pandemic world, education in the delivery of educational models has changed drastically.

Professional development is imperative to meeting those changes and challenges so that all children can thrive in public education. Title II-A funds also support new teacher induction, school-based instructional support coaches and leaders, and materials and services for non-public schools. Of particular importance, given the high number of multi-language Learners we have in the Providence Public Schools and other AFT locals, achieving a multilingual learner (MLL) certification to meet the needs of our multi-language learners is imperative and will be adversely impacted by the loss of funds.

10. Many Rhode Island school districts utilize a model of hiring teachers to work as instruction coaches to improve teaching practice. Districts rely on federal funding to fully or partially fund these positions. Reduced federal funding to hire instructional coaches jeopardizes efforts to enhance teaching practice.

11. In recent years, Rhode Island has embarked on a project to ensure all educators are proficient or aware of the science of reading after the passage of state law. Every Rhode Island teacher must demonstrate awareness or proficiency based on their teaching position. Reduced federal funding for teacher professional development jeopardizes continued compliance with state law and regulations meant to address reading instruction.

12. In 2025, the Rhode Island Board of Education revised state regulations governing the instruction of multilingual learners. The revised regulations require extensive new teacher professional development. The delivery of this enhanced professional development is jeopardized by reduced federal funding.

13. **Title III-A** funds help support the employment of educators working with English learners. These positions are often grant-dependent and housed in districts with high multilingual populations. Several of our members hold positions funded in whole or in part by Title III-A

allocations. Given the increasing number of students who need support and instruction to develop their language skills, English language learners without these resources often lack access to services. We will fall out of compliance with DOJ regulations and ML regulations required by the state, and there will be a direct impact on MLL services, including bilingual social workers and teachers for sheltered content instruction and coaching. Furthermore, providing platforms and systems for ML students and their families to access information and understand the day-to-day operations of their children in school will also result in losses and disruptions to services and communication with families.

14. As noted above, in 2025, the Rhode Island Board of Education revised state regulations governing the instruction of multilingual learners. The revised regulations require revisions to the models used to instruct multilingual learners. The delivery of this enhanced instruction system for multilingual learners is jeopardized by reduced federal funding.

15. **Title IV-A and IV-B** funds support a wide array of services delivered by RIFTHP-represented personnel, including after-school programming, mental and physical health services, and expanded curriculum offerings in STEM, arts, and foreign languages. Many of these roles are directly dependent on federal funding streams and are at risk of elimination without access to the expected July 1 funding. Direct student services for social emotional needs, i.e., social workers, school psychologists, and registered behavioral technicians, will decrease the capacity within the district and within the state to communities that need these programs for the students who are best served by these programs. Title IV-B supports Community Learning Centers that provide enriching opportunities for community members and students during vacations and all non-school hours, particularly in high needs, low-performing districts. While

Title IV funds are not included in school district budgets, their impact on supporting our students before, after school, and on vacations cannot be stressed enough.

16. In Providence, as well as most AFT/RIFTHP Districts, there are many personnel funded by these title Programs, including but not limited to instructional coaches, MLL support staff both at the school and central office levels, social workers, school psychologists, and registered behavioral technicians. And while final decisions have not yet been made regarding those roles, the only options a district has is to either close the role or reassign the staff to vacant roles, cutting other roles and funding sources to offset the funding loss or layoffs. Given the timing, the federal government has put school districts at a significant disadvantage as hiring, transfers, and teacher assignments have already taken place, and school districts are currently planning for the 25-26 school year. The loss of millions of dollars for urban and urban ring districts, particularly Providence, given its size and low-performing status, will do irreparable harm to teachers and students by cutting programs and educators that help our students thrive.

III. The July 1 Announcement

17. On July 1, 2025, I learned that the U.S. Department of Education would not be releasing funding for Title II-A, III-A, IV-A, and IV-B grant programs as scheduled. These funds are customarily released on July 1 so that school districts can finalize staffing and programming for the academic year beginning in late August or early September.

18. I understand that the Department has not provided a clear timeline for when, or if, these funds will be released. This uncertainty has significantly disrupted school district budgeting and staffing decisions, which in turn affect our members' employment and working conditions.

19. Several of our local affiliates have reported that school districts have already issued conditional employment notices or "soft freezes" on positions funded by ESEA programs.

Some professional development sessions have been canceled or delayed, pending clarification on federal funding availability.

IV. Harms to RIFTHP

20. The withholding of ESEA funds places RIFTHP-represented positions at risk, particularly those funded by Titles II-A, III-A, and IV-A. These include instructional coaches, English language development staff, arts teachers, and counselors. If funding is not restored, layoffs or reassignments are likely to occur in multiple districts.

21. Many of our members have already lost access to scheduled professional development workshops and training for the summer of 2025. These training courses are essential to maintaining licensure, improving instructional practice, and preparing for new curricular and assessment mandates.

22. A loss of grant-funded positions or services will result in increased class sizes, reduced language support, and diminished access to enrichment opportunities for students, all of which exacerbate working conditions and professional stress for our members. It will also weaken our Rhode Island Department of Education (RIDE) local affiliate. RIFTHP Local 2012 was informed last week that they will be laying-off 11 of their members who are paid through these funds. This reduction will impact service delivery, professional development, mandated data reporting, certification issuance and other services vital to school districts and educators.

23. RIFTHP also collects dues from its members via payroll deduction. If school districts lay off staff whose positions are funded by ESEA programs, RIFTHP will lose corresponding dues revenue. This will diminish the organization's ability to provide core representational services, including contract enforcement and member support.

24. In addition, the reduction in bargaining unit size will weaken RIFTHP's position in collective bargaining, limiting our ability to negotiate fair wages, working conditions, and staffing policies for our remaining members.

Executed on July 21, 2025 in Providence, Rhode Island.

Maribeth Calabro

Maribeth Calabro
President, Rhode Island Federation of
Teachers and Health Professionals